



## Arizona Department of Education Health and Nutrition Services Division

### Administrative Review Summary Report

School Food Authority Name: Wide Ruins Community School

CTD: 01-40-10

Site(s): Wide Ruins Community School

Contacts: Jeannie Lewis, Principal and Darryl Rockbridge, Food Service Supervisor

Review Date: April 20, 2022

Review Period: March 2022

Programs Reviewed:

National School Lunch

School Breakfast

Afterschool Snack

Fresh Fruit & Vegetable

Special Milk

At-Risk Afterschool Meals

No.	Review Observations & Findings	Technical Assistance Provided	Required Corrective Action
<b>Performance Standard 1: Certification &amp; Benefit Issuance - Critical Area</b>			

*Not applicable.*

#### Performance Standard 1: Meal Counting & Claiming - Critical Area

1	<p>Unallowable methods of counting reimbursable meals were used during the review period. Specifically, attendance counts were used on 3/1/22, 3/2/22, and 3/3/22; no counts were recorded on 3/4/22; and checkmarks were miscounted on 3/7/22, 3/21/22, 3/22/22, 3/24/22, 3/25/22, and 3/29/22. This was deemed a systemic error and contributed towards fiscal action calculations. A full recalculation of breakfasts and lunches served for the months of December 2021–April 2022 was conducted.</p>	<p>Discussed how current system allowed for this to happen and potential changes that could be made to ensure it doesn't continue (e.g., using a tally system, staff training, etc.).</p>	<p><i>Changes to the procedures of meal counting and claiming have been made and a recalculation was conducted. Fiscal action calculations were disregarded. No further corrective action is required at this time.</i></p>
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#### Performance Standard 2: Meal Components & Quantities - Critical Area

2	<p>The following products could not be credited towards the meal pattern due to insufficient documentation: pancakes (breakfast 3/10/22), chicken in baked chicken (lunch 3/8/22), cornbread (lunch 3/8/22), hot dog (lunch 3/8/22), ham and turkey in chef salad (lunch 3/9/22), tortilla chips and ground turkey in nacho supreme (lunch 3/11/22). Without sufficient documentation, the reviewer was unable to determine if the quantity requirements were met. This was not a repeat finding from Cycle 2 and therefore did not contribute toward fiscal action calculations.</p>	<p>Discussed requirements regarding processed product documentation and provided examples. USDA Food Fact Sheets can be found on USDA's website at <a href="http://www.fns.usda.gov/fdd/nslp-usda-foods-fact-sheets/">http://www.fns.usda.gov/fdd/nslp-usda-foods-fact-sheets/</a>. The CN Labels and Product Formulation Statements Recorded Webinar &amp; Webinar Slides can be found on ADE's website at <a href="http://www.azed.gov/hns/nslp/training">http://www.azed.gov/hns/nslp/training</a> under the Online Training Library tab. Please note that repeated violations involving food quantities may result in fiscal action and/or termination of performance-based reimbursement (extra 7 cents).</p>	<p><i>Please provide a Child Nutrition (CN) label, Product Formulation Statement (PFS), or Nutrition Facts label for: pancakes, chicken, cornbread, hot dog, ham, turkey, tortilla chips, and ground turkey. If unable to provide a sufficient crediting documentation, please provide written assurance that the product will no longer be served to students and provide the label of the item that will be served in its place. Additionally, please provide written assurance that a product will not be credited towards the meal pattern without proper crediting documentation. Additionally, the certificate of completion of CN Labels and Product Formulation Statements must be provided.</i></p>
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| <p>3 Portion sizes observed during the review period did not meet minimum amounts required by the breakfast meal pattern. Specifically, on 3/11/22, Muffin Square crediting as 0.75 ounce equivalents of grain were served with 1.0 ounce equivalents of yogurt. Meat/meat alternates may not be counted toward the grain component until after the minimum daily grains requirement (1.0 ounce equivalents) is offered.</p> | <p>Discussed how current system allowed for this to happen and potential changes that could be made to ensure it doesn't continue (i.e., offering a grain that credits as at least 1.0 ounce equivalent). Meal pattern requirements for the National School Breakfast Program can be found on ADE's website at <a href="http://www.azed.gov/hns/nslp">http://www.azed.gov/hns/nslp</a> under the Meal Pattern tab. The Step-by-Step Instruction: How to Plan a Breakfast Menu can be found on ADE's website at <a href="http://www.azed.gov/hns/nslp/training">http://www.azed.gov/hns/nslp/training</a> under the Online Training Library tab.</p>   | <p><i>Please provide one week of breakfast production records which demonstrates that at least 1.0 equivalent of grains was offered prior to crediting meat/meat alternates toward the grain component. Additionally, please provide a written description of the changes that have been made to ensure that at least 1.0 ounce equivalent of grain will be offered prior to crediting meat/meat alternates toward the grain component. Additionally, the certificate of completion of Step-by-Step Instruction: How to Plan a Breakfast Menu must be submitted.</i></p> |
| <p>4 Quantities observed during the review period did not meet minimum amounts required by the meal pattern. Specifically, daily meat/meat alternate requirements were not met at lunch on 3/8/22, 3/9/22, or 3/11/22. This was attributed to insufficient crediting documentation for meat products. This was not a repeat finding from Cycle 2 and therefore did not contribute toward fiscal action calculations.</p>     | <p>Discussed how current system allowed for this to happen and potential changes that could be made to ensure it doesn't continue (e.g., changes in serving utensils, recipes, etc.). Meal pattern requirements for the National School Lunch Program can be found on ADE's website at <a href="http://www.azed.gov/hns/nslp">http://www.azed.gov/hns/nslp</a> under the Meal Pattern tab. The Step-by-Step Instruction: How to Plan a Lunch Menu can be found on ADE's website at <a href="http://www.azed.gov/hns/nslp/training">http://www.azed.gov/hns/nslp/training</a> under the Online Training Library tab. Please note that repeated violations involving food quantities may result in fiscal action and/or termination of performance-based reimbursement (extra 7 cents).</p>   | <p><i>Please provide a written description of the changes that have been made to ensure that daily meat/meat alternate quantities meet minimum amounts required by the meal pattern at lunch.</i></p>  |
| <p>5 Quantities observed during the review period did not meet minimum amounts required by the meal pattern. Specifically, weekly meat/meat alternate requirements were not met at lunch. This was attributed to insufficient crediting documentation for meat products. This was not a repeat finding from Cycle 2 and therefore did not contribute toward fiscal action calculations.</p>                                  | <p>Discussed how current system allowed for this to happen and potential changes that could be made to ensure it doesn't continue (e.g., obtaining Child Nutrition labels and Product Formulation Statements, maintaining crediting documentation, etc.). Meal pattern requirements for the National School Lunch Program can be found on ADE's website at <a href="http://www.azed.gov/hns/nslp">http://www.azed.gov/hns/nslp</a> under the Meal Pattern tab. The Step-by-Step Instruction: How to Plan a Lunch Menu can be found on ADE's website at <a href="http://www.azed.gov/hns/nslp/training">http://www.azed.gov/hns/nslp/training</a> under the Online Training Library tab. Please note that repeated violations involving food quantities may result in fiscal action and/or termination of performance-based reimbursement (extra 7 cents).</p> | <p><i>Please provide a written description of the changes that have been made to ensure that weekly meat/meat alternate quantities meet minimum amounts required by the meal pattern at lunch.</i></p>   |

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| 6 | Quantities observed during the review period did not meet minimum amounts required by the meal pattern. Specifically, daily grain requirements were not met at lunch on 3/8/22, or 3/11/22. This was attributed to insufficient crediting documentation for grain products. This was not a repeat finding from Cycle 2 and therefore did not contribute toward fiscal action calculations. | Discussed how current system allowed for this to happen and potential changes that could be made to ensure it doesn't continue (e.g., maintaining labels for all products served, etc.). Meal pattern requirements for the National School Lunch Program can be found on ADE's website at <a href="http://www.azed.gov/hns/nslp">http://www.azed.gov/hns/nslp</a> under the Meal Pattern tab. The Step-by-Step Instruction: How to Plan a Lunch Menu can be found on ADE's website at <a href="http://www.azed.gov/hns/nslp/training">http://www.azed.gov/hns/nslp/training</a> under the Online Training Library tab. Please note that repeated violations involving food quantities may result in fiscal action and/or termination of performance-based reimbursement (extra 7 cents).       | <i>Please provide a written description of the changes that have been made to ensure that daily grain quantities meet minimum amounts required by the meal pattern at lunch.</i>     |
| 7 | Quantities observed during the review period did not meet minimum amounts required by the meal pattern. Specifically, weekly grain requirements were not met at lunch. This was attributed to insufficient crediting documentation for grain products. This was not a repeat finding from Cycle 2 and therefore did not contribute toward fiscal action calculations.                      | Discussed how current system allowed for this to happen and potential changes that could be made to ensure it doesn't continue (e.g., changes in serving utensils, recipes, etc.). Meal pattern requirements for the National School Lunch Program can be found on ADE's website at <a href="http://www.azed.gov/hns/nslp">http://www.azed.gov/hns/nslp</a> under the Meal Pattern tab. The Step-by-Step Instruction: How to Plan a Lunch Menu can be found on ADE's website at <a href="http://www.azed.gov/hns/nslp/training">http://www.azed.gov/hns/nslp/training</a> under the Online Training Library tab. Please note that repeated violations involving food quantities may result in fiscal action and/or termination of performance-based reimbursement (extra 7 cents).             | <i>Please provide a written description of the changes that have been made to ensure that weekly grain quantities meet minimum amounts required by the meal pattern at lunch.</i>    |
| 8 | Quantities observed during the review period did not meet minimum amounts required by the meal pattern. Specifically, daily vegetable requirements were not met at lunch on 3/11/22; 5/8 cup vegetable was served when 3/4 cup vegetable is required. This was not a repeat finding from Cycle 2 and therefore did not contribute toward fiscal action calculations.                       | Discussed how current system allowed for this to happen and potential changes that could be made to ensure it doesn't continue (e.g., offering additional vegetables, revising recipes, etc.). Meal pattern requirements for the National School Lunch Program can be found on ADE's website at <a href="http://www.azed.gov/hns/nslp">http://www.azed.gov/hns/nslp</a> under the Meal Pattern tab. The Step-by-Step Instruction: How to Plan a Lunch Menu can be found on ADE's website at <a href="http://www.azed.gov/hns/nslp/training">http://www.azed.gov/hns/nslp/training</a> under the Online Training Library tab. Please note that repeated violations involving food quantities may result in fiscal action and/or termination of performance-based reimbursement (extra 7 cents). | <i>Please provide a written description of the changes that have been made to ensure that daily vegetable quantities meet minimum amounts required by the meal pattern at lunch.</i> |

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**Performance Standard 2: Dietary Specifications & Nutrient Analysis - Critical Area**

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No findings.

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**Meal Access & Reimbursement: Certification & Benefit Issuance**

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Not applicable.

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**Meal Access & Reimbursement: Verification**

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Not applicable.

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**Meal Access & Reimbursement: Meal Counting & Claiming**

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| 9 | Daily edit checks are not being conducted. | Discussed how to complete daily edit checks using ADE's Daily Edit Check worksheet. The Daily Edit Check Worksheet can be found on ADE's website at <a href="https://www.azed.gov/hns/nslp/forms">https://www.azed.gov/hns/nslp/forms</a> under the Operational tab. The Step-by-Step Instruction: How to Complete Daily Edit Checks can be found on ADE's website at <a href="https://www.azed.gov/hns/nslp/training">https://www.azed.gov/hns/nslp/training</a> under the Online Training Library tab. | A completed daily edit check worksheet for the month of May 2022 was provided with fiscal recalculation documentation. Please provide a written description for how daily edit checks will be conducted including how the attendance factor will be updated each year and the name of the individual responsible for completing the daily edit check. |
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**Meal Pattern & Nutritional Quality: Offer Versus Serve**

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No findings.

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**Meal Pattern & Nutritional Quality: Meal Components & Quantities**

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No findings.

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**Resource Management**

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| 10 | Program expenditures exceeded program revenues by \$59,775.06 and no documentation of a fund transfer or explanation for how food service costs were covered was provided.   | Discussed that a negative ending fund balance requires an operating transfer from non-Federal funds (e.g., general fund) to cover the deficit. Transfers into the nonprofit school food service account must be permanent and may not be transferred out if the balance becomes positive in the future. | Please provide a written description of how the \$59,775.06 deficit was, or will be, covered by non-Federal funds including the source of non-Federal funds to be used. Additionally, please provide documentation of the fund transfer to restore the nonprofit school food service account to a \$0 or positive balance.   |
| 11 | Unallowable costs were paid for by the nonprofit school food service account. Specifically, \$165.45 was spent on coffee grounds for adults on 8/13/20 and \$330.00 was spent on ribeye steaks for a non-program promotional meals on 5/11/21. | Discussed specific unallowable expenses. An extensive list of allowable and unallowable costs can be found in 2 CFR 200 Subpart E General Provisions for Selected Items of Cost.  | Please provide written procedures for determining the allowability of costs as required by 2 CFR 200.303(b)(7) and for billing non-Federal funding sources when purchasing non-program foods using the nonprofit food service account. Please also provide written assurance that all expenses of the nonprofit school food service account will be limited to those costs which are necessary, reasonable, allocable; and also that these costs are in accordance with 2 CFR 200 Subpart E Cost Principles. Additionally, please provide supporting documentation which reflects that the total amount of unallowable costs (\$495.45) was reimbursed to the nonprofit school food service account. |

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| <p>12 Meals served to teachers, administrators, custodians, and other adults were not priced so that the adult payment in combination with any per-lunch revenues from other sources designated specifically for the support of adult meals (such as State or local fringe benefit or payroll funds, or funding from voluntary agencies) was sufficient to cover the overall cost of the meal. Specifically, \$2.50 is charged for adult breakfast and \$3.00 is charged for adult lunch.</p> | <p>Discussed ways to determine adult meal prices which included a per meal cost analysis or pricing adult meals to reflect the amount of reimbursement received for a free meal plus the per meal value of entitlement and bonus commodities for non-pricing programs. Referred to HNS 27-2021 Guidance for Adult Meal Pricing in School Year 2021-2022 (SY 22).</p> | <p><i>Please provide a written description of the steps which have been taken to increase adult meal prices and resolve the discrepancy, including the exact formula used to price adult meals. Additionally, please submit supporting documentation which reflects that prices have been increased to the appropriate level.</i></p> |
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**General Program Compliance: Civil Rights**

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| <p>13 The public media release was not provided to local media, the unemployment office and local employers considering large layoffs.</p>  | <p>Discussed schools operating SSO must provide public notification regarding the availability of school meals and the eligibility criteria at or near the beginning of the school year. For SY 2021-2022, schools participating in SSO should notify households that meals will be offered free through SSO. Referred to HNS 17-2021 &amp; SP 15-2021 (Q10). Additionally, referred to the template release that can be found on ADE's website at <a href="https://www.azed.gov/hns/nslp/forms">https://www.azed.gov/hns/nslp/forms</a> under the Outreach tab.</p> | <p><i>Please provide written procedures for distributing the public media release and written assurance that the public media release will be submitted to the local media, the unemployment office and local employers considering large layoffs prior to the start of each school year.</i></p> |
| <p>14 Program staff have not been trained on civil rights topics. Specifically, documentation to support completion of civil rights training was only provided for the lead food service worker and the principal. Civil rights training documentation was not provided for the remaining food service staff.</p> | <p>Discussed requirement and how to document that requirement has been met. An acceptable civil rights power point training material can be found on ADE's website at <a href="https://www.azed.gov/hns/civilrights">https://www.azed.gov/hns/civilrights</a>.</p>   | <p><i>Please provide written assurance that all food service staff will be trained upon hire and as needed on Civil Rights Compliance in Child Nutrition Programs. Describe the process that will be implemented to ensure that this requirement is adhered to and properly documented.</i></p>   |

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**General Program Compliance: SFA On-Site Monitoring**

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| <p>15 On-site reviews of the lunch meal counting and claiming procedures for all sites within the SFA are not being conducted each year prior to February 1.</p> | <p>Discussed requirement to conduct an on-site review of lunch meal counting and claiming procedures for all sites when operating multiple sites (including bus routes). A template for Internal On-Site Monitoring Form-Lunch of the Meal Counting and Claiming System can be found on ADE's website at <a href="https://www.azed.gov/hns/nslp/forms">https://www.azed.gov/hns/nslp/forms</a> under the Operational tab. Discussed who would be responsible for completing this each year in which multiple sites are being operated.</p> | <p><i>Please provide a completed Internal On-Site Monitoring Form of the Meal Counting and Claiming System. Additionally, please provide a written description of the process that has been put in place to ensure that all sites receive an on-site review of the meal counting and claiming procedures each year prior to February 1.</i></p> |
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16 On-site reviews of the breakfast meal counting and claiming procedures for 50% of the sites within the SFA are not being conducted each year prior to February 1.	Discussed requirement to conduct an on-site review of breakfast meal counting and claiming procedures for 50% of sites when operating multiple sites (including bus routes). A template for Internal On-Site Monitoring Form-Breakfast of the Meal Counting and Claiming System can be found on ADE's website at <a href="https://www.azed.gov/hns/nslp/forms">https://www.azed.gov/hns/nslp/forms</a> under the Operational tab. Discussed who would be responsible for completing this each year in which multiple sites are being operated.	<i>Please provide a completed Internal On-Site Monitoring Form of the Meal Counting and Claiming System. Additionally, please provide a written description of the process that has been put in place to ensure that 50% of the sites operating breakfast will receive an on-site review of the meal counting and claiming procedures each year prior to February 1.</i>
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**General Program Compliance: Local Wellness Policy**

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*No findings.*

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**General Program Compliance: Competitive Food Services**

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*No findings.*

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**General Program Compliance: Professional Standards**

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*No findings.*

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**General Program Compliance: Water**

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*No findings.*

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**General Program Compliance: Food Safety, Storage and Buy American**

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17 The following reviewed products indicated violations of the Buy American Provision in 7CFR 210.21(d) on-site at reviewed schools: pineapple tidbits. Additionally, documentation justifying a Buy American exception was not maintained/on file.	Discussed the Buy American provision requirements and procedures to ensure compliance. Referred to SP38-2017, Buy American Webinar and FAQ. Funds used from the non-profit food service account must be used to procure food products that comply with the Buy American Provision. Additional information on the requirements of this provision, including ADE's prototype Buy American exception document, can be found on ADE's website at <a href="https://www.azed.gov/hns/nslp/forms">https://www.azed.gov/hns/nslp/forms</a> under the Operational tab. Buy American Recorded Webinar and FAQ can be found on ADE's website at <a href="https://www.azed.gov/hns/nslp/training">https://www.azed.gov/hns/nslp/training</a> under the Online Training Library tab.	<i>Please provide a written description of the changes that have been made to procurement and/or recordkeeping procedures to ensure that the requirements of the Buy American Provision are met.</i>
18 The most recent food safety inspection report was not posted in a prominent location and was not visible to all program participants.	Discussed making copies of most recent report and feasible places for posting.	<i>Please provide a photo demonstrating that the most recent food safety inspection report has been posted in a location where the program participants can view it.</i>

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**General Program Compliance: Reporting & Recordkeeping**

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| 19 | Production record and recipe crediting are inaccurate. Specifically, WW Yeast Roll served on 3/10/22 during the review period contained 1.25 oz eq grain; however, the production record and recipe indicated it contained 1.5 oz eq grain.                  | Discussed how to credit meal components and ensuring consistency with recipes, labels, and production records. Crediting resources can be found on ADE's website at <a href="https://www.azed.gov/hns/nslp/forms">https://www.azed.gov/hns/nslp/forms</a> under the Menu Planning tab.                                     | <i>Please provide a production record and recipe that reflects the correct crediting information for WW Yeast Roll. Additionally, please provide a written description of changes made to ensure crediting is correctly reflected on recipes and production records.</i>   |
| 20 | Production record and recipe crediting are inaccurate. Specifically, Muffin Square served on 3/11/22 during the review period contained 0.75 oz eq grain; however, the production record and recipe indicated it contained 1.0 oz eq grain.                  | Discussed how to credit meal components and ensuring consistency with recipes, labels, and production records. Crediting resources can be found on ADE's website at <a href="https://www.azed.gov/hns/nslp/forms">https://www.azed.gov/hns/nslp/forms</a> under the Menu Planning tab.                                     | <i>Please provide a production record and recipe that reflects the correct crediting information for Muffin Square. Additionally, please provide a written description of changes made to ensure crediting is correctly reflected on recipes and production records.</i>   |
| 21 | Production record crediting is inaccurate. Specifically, Lettuce/Tomato Nacho Garnish served on 3/11/22 during the review period contained 1/4 cup dark green vegetable; however, the production record indicated it contained 1/2 cup dark green vegetable. | Discussed how to credit meal components and ensuring consistency with recipes, labels, and production records. Crediting resources can be found on ADE's website at <a href="https://www.azed.gov/hns/nslp/forms">https://www.azed.gov/hns/nslp/forms</a> under the Menu Planning tab.                                     | <i>Please provide a production record and recipe that reflects the correct crediting information for Lettuce/Tomato Nacho Garnish. Additionally, please provide a written description of changes made to ensure crediting is correctly reflected on recipes and production records.</i>  |
| 22 | The Food Program Permanent Service Agreement (FPPSA) was not updated appropriately with staff turnover. Specifically, the Designated Official is no longer employed at the school.   | Discussed reporting requirements for Food Program Permanent Service Agreement (FPPSA) and who would be responsible for submitting. A manual and electronic FPPSA form can be found on ADE's website at <a href="https://www.azed.gov/hns/nslp/forms">https://www.azed.gov/hns/nslp/forms</a> under the Organizational tab. | <i>Please submit an updated Food Program Permanent Service Agreement (FPPSA) with current program staff. Additionally, please provide written assurance that the FPPSA will be updated to reflect current employees whenever turnover occurs within the program, as well as the steps that will be taken to ensure this requirement is adhered to.</i> |

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**General Program Compliance: School Breakfast Program & Summer Food Service Program Outreach**

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*No findings.*

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**Other Federal Program Reviews: Afterschool Snack Program**

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*Not applicable.*

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**Other Federal Program Reviews: Seamless Summer Option**

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Will be reviewed in Summer 2022 if applicable.

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**Other Federal Program Reviews: Fresh Fruit & Vegetable Program**

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*Not applicable.*

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**Other Federal Program Reviews: Special Milk Program**

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*Not applicable.*

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**Other Federal Program Reviews: At-Risk Afterschool Meals**

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*Not applicable.*

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Comments/Recommendations:

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Congratulations, Wide Ruins Community Schools has successfully completed the Administrative Review for the 2021-2022 school year. It is recommended that trainings in crediting requirements are completed throughout the year. It is also recommended that internal compliance checks are conducted periodically in these critical areas to maintain program integrity. Thank you for your cooperation during the review process.

**To stay on track with NSLP requirements, check out the NSLP at a Glance Calendar & Monthly Checklist on our website at <https://www.azed.gov/hns/nslp/forms> under the Calendars and Checklists tab.**

**Training: In-person classes, web-based training and How-To guides can be found on ADE's website at <https://www.azed.gov/hns/nslp/training>.**

Fiscal Action Assessed?

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| <input checked="" type="checkbox"/> No- SBP      | <input type="checkbox"/> Yes- SBP      | \$0      |
| <input checked="" type="checkbox"/> No- NSLP     | <input type="checkbox"/> Yes- NSLP     | \$0      |
| <input checked="" type="checkbox"/> No- SSO SBP  | <input type="checkbox"/> Yes- SSO SBP  | \$0      |
| <input checked="" type="checkbox"/> No- SSO NSLP | <input type="checkbox"/> Yes- SSO NSLP | \$360.00 |

Fiscal Action under \$600 will be disregarded.

Please submit corrective action response by July 21, 2022 to Kariann Sadlon at [Kariann.Sadlon@azed.gov](mailto:Kariann.Sadlon@azed.gov).

**Kariann Sadlon**

Digitally signed by Kariann Sadlon  
Date: 2022.06.20 08:06:18 -07'00'

Reviewer Signature

Date

If you disagree with any finding that affects the claim for reimbursement, you may appeal the decision by following the [School Food Authority Appeal Procedure for the Administrative Review](#) found on the National School Lunch Program Administrative Review tab on the ADE website.

Equity for all students to achieve their full potential  
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